

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

IN RE:

WILLIAM TAGG,

Debtor.

Case No. 21-23424-1
Subchapter V
Chapter 11

OBJECTION TO MOTIONS TO DISMISS OR CONVERT

COMES NOW the Debtor to object to **OBJECT** to the Motions to Dismiss or convert this case heretofore filed. Your debtor would show that as predicated in his plan he has obtained a purchase contract for the real property of Charleston II Builders which would allow most, if not all of the lawful and just claims of creditors to be paid in full. Your debtor would also show that he shall be in compliance with all U.S. Trustee requirements before the next hearing and that he endeavors to pay not only the lawful claims that are due but also the lawful expenses of this case.

WHEREFORE, PREMISES CONSIDERED, DEBTOR PRAYS:

1. For a hearing.
2. For the right to amend this objection.
3. For such further and other relief as to which the debtor may be entitled.

RESPECTFULLY SUBMITTED,

/s/ Ted I. Jones

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CERTIFICATE OF SERVICE

I, Ted I. Jones, hereby certify that I have forwarded a copy of this pleading to all parties in this case pursuant to the court's electronic noticing system, and to all others via first-class mail, postage pre-paid, this the 24th day of February, 2022.

/s/ Ted I. Jones

Ted I. Jones